

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

5. RAMON ANZIANI
14. CHRISTOPHER JOHNSON
29. WILLIAM FELIZ

)
)
)
)
)
)
)

Cr. No. 02-10113-RGS

FILED
IN CLERKS OFFICE
2004 JUN -2 A 10:40

DISTRICT COURT
DISTRICT OF MASS.

[ASSENTED-TO] MOTION TO CONTINUE TRIAL
(CURRENTLY SCHEDULED FOR AUGUST 2, 2004)

The United States of America, by and through its attorneys Michael J. Sullivan, United States Attorney for the District of Massachusetts, and Rachel E. Hershfang, Assistant U.S. Attorney, hereby moves to continue and consolidate the trial of the above-captioned three defendants in this matter, currently scheduled for August 2 until a date after September 1, 2004, in the convenience of the Court and counsel. Counsel for all three defendants have been consulted and have no objection to the continuance.

In support of this motion, the government states as follows:

1. August 2, the date currently set for trial, is the first Monday following the Democratic National Convention, to be held in Boston;

2. According to recently published plans for the Convention, the city of Boston will be effectively marooned during the week of the convention, with little or no access (by private vehicle or public transportation) in and out of the city;

3. To prepare effectively for trial, it is necessary that

the government have access to its witnesses and that the defendants be able to meet with counsel;

4. Given the anticipated restrictions on movement in and out of Boston during the week of July 26, and the likelihood that the U.S. Marshal Service will not transport prisoners to the courthouse during that week, trial preparation would be seriously compromised; and

5. Counsel for Anziani, Johnson and Feliz do not oppose a continuance of the trial.

Accordingly, the government respectfully requests that the Court continue the trial in this matter until a date after September 1, 2004, in the convenience of the Court and the parties.

Respectfully submitted,


MICHAEL J. SULLIVAN
United States Attorney

By: 
RACHEL E. HERSHFANG
Assistant U.S. Attorney

Dated: June 2, 2004

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon Melvin Norris, Jonathan Shapiro, and Lawrence P. Vogelmann a copy of the foregoing by facsimile transmission and first class mail this 2nd day of June, 2004.


RACHEL E. HERSHFANG
ASSISTANT UNITED STATES ATTORNEY